

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO  
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY  
(APWU/USPS-T6-29)**

The United States Postal Service hereby provides a response to the above-listed, follow-up interrogatory of the American Postal Workers Union (APWU), AFL-CIO, dated April 6, 2012. The interrogatory is stated verbatim and is followed by the response. Today's filing of a complete response to this interrogatory obviates the need to file a status report as previously anticipated.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

Matthew J. Connolly  
Attorney

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-8582; Fax -5418  
matthew.j.connolly@usps.gov  
June 29, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-29.** For each of the following types of routes, state the average miles per route and the average cost per route for PVS routes and, separately, for HCR routes:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

**RESPONSE:**

The chart below contains the average miles per route and the average cost per route for HCR routes.

<b>Transportation Category</b>	<b>Average Miles Per Route</b>	<b>Average Cost Per Route</b>
Inter Area	<b>480,187</b>	<b>\$853,466</b>
Inter Cluster	<b>246,256</b>	<b>\$504,620</b>
Inter P&DC	<b>172,511</b>	<b>\$351,904</b>
Intra P&DC	<b>96,030</b>	<b>\$209,295</b>

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**RESPONSE TO APWU/USPS-T6-29 (CONT.)**

The chart below contains the average miles per route and the average cost per route for PVS routes.

<b>Transportation Category</b>	<b>Average Miles Per Route</b>	<b>Average Cost Per Route</b>
Intra P&DC	<b>12,732</b>	<b>\$109,982</b>

Because the majority of PVS routes predominately serve Post Office stations and branches within metropolitan areas, those routes are categorized as Intra P&DC routes.

The responsive data were retrieved from two separate database systems. The Vehicle Maintenance Accounting System (VMAS) contains PVS miles driven and the Enterprise Data Warehouse provided total PVS operating cost and the total number of PVS routes registered.

The number of annual vehicle miles was determined by taking the mileage data available for the last full postal quarter (II) and multiplying the quarter total by four (4). Total PVS operating cost was calculated based on actual expenses incurred for postal quarters I and II (October 2011 through March 2012) and the projected expenses for the remaining six months of this fiscal year. This approach was used in order to expedite the response to this interrogatory.

Obtaining mileage data directly from PVS schedules would have required the Postal Service to download and review 9,297 schedules from the VMAS database. As the Postal Service noted in its opposition to APWU's motion to

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**RESPONSE TO APWU/USPS-T6-29 (CONT.)**

compel a response to this interrogatory, the Postal Service would not have been able to complete such analysis prior to the deadline for submitting reply briefs in this docket.